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1	QUINN EMANUEL URQUHART & SULLIVAN, LLP Charles K. Verhoeven (Bar No. 170151)			
2	charles K. Verhoeven (Bar No. 170131) charlesverhoeven@quinnemanuel.com David A. Perlson (Bar No. 209502)			
3	davidperlson@quinnemanuel.com Melissa Baily (Bar No. 237649)			
4	melissabaily@quinnemanuel.com John Neukom (Bar No. 275887)			
5	johnneukom@quinnemanuel.com Jordan Jaffe (Bar No. 254886)			
6	jordanjaffe@quinnemanuel.com 50 California Street, 22 <sup>nd</sup> Floor			
7	San Francisco, California 94111-4788 Telephone: (415) 875-6600			
8	Facsimile: (415) 875-6700			
9	Attorneys for WAYMO LLC			
10	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION			
11				
12	WAYMO LLC,	CASE NO. 3:17-cv-00939-WHA		
13   14	Plaintiff,	DECLARATION OF JEFF NARDINELLI		
15	vs.			
16	UBER TECHNOLOGIES, INC.; OTTOMOTTO LLC; OTTO TRUCKING			
17	LLC,			
18	Defendants.			
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		Case No.3:17-cv-00939-WHA		

DECLARATION OF JEFF NARDINELLI

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27 28 I, Jeffrey W. Nardinelli, hereby declare as follows.

- 1. I am a member of the bar of the State of California and an associate with Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC ("Waymo"). I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently as follows.
- 2. Waymo has produced documents referenced in the second paragraph of Waymo's opposition to Uber's motion to compel at the following Bates numbers and ranges: WAYMO-UBER-00004093-4329; WAYMO-UBER-00031973-32529; WAYMO-UBER-00032540; WAYMO-UBER-00031431-446; WAYMO-UBER-00031464-554; WAYMO-UBER-00031612, WAYMO-UBER-00031636-801, WAYMO-UBER-00031818-972; WAYMO-UBER-00032541.
- 3. Waymo has produced a document entitled "Chauffeur Commercialization Status Update" dated December 5, 2012, at Bates number WAYMO-UBER-00020826-899. Waymo has produced a document entitled "Waymo Scaling Strategy" dated March 22, 2017, at Bates number WAYMO-UBER-00032218-283.
- 4. Waymo has produced a document entitled "Chauffeur Business Plan" dated November 6, 2013, at Bates number WAYMO-UBER-00031464-552. Waymo has produced a document reflecting the ongoing discussions referenced in the brief at Bates number WAYMO-UBER-00032176-217.
- 5. Waymo has produced a document entitled "Chauffeur Update" dated October 11, 2016, at Bates number WAYMO-UBER-00031636 (produced natively).
- 6. Waymo has produced a one-page slide, dated October 21, 2016, at Bates number WAYMO-UBER-00031972. Waymo has produced a 61-page slide presentation entitled "Chauffeur Plan 2017," dated November 8, 2016, at Bates number WAYMO-UBER-00031637-697.
- 7. Waymo has produced the data referenced in the brief at Bates number WAYMO-UBER-00004234-329.
- 8. Waymo has produced its P&L (comprising 13 spreadsheets) at Bates number WAYMO-UBER-00032541 (produced natively).

1	9.	Attached as Exhibit 1 is a true and correct copy of Waymo's Responses and	
2	Objections to Uber's First Set of Requests for Production in this action, served June 12, 2017.		
3	10.	Attached as Exhibit 2 is a true and correct copy of excerpts of the deposition of	
4	Daniel Chu, taken in this action on April 3, 2017.		
5	11.	Attached as Exhibit 3 is a true and correct copy of excerpts of the deposition of	
6	Jennifer Haroon, taken in this action on July 26, 2017.		
7	12.	Attached as Exhibit 4 is a true and correct copy of Waymo's Fourth Set of Requests	
8	for Production in this action, including RFPs 270-276.		
9	13.	Attached as Exhibit 5 is a true and correct copy of correspondence between counsel	
10	in this action, dated between June 30 and July 19, 2017.		
11	I declare under penalty of perjury under the laws of the State of California that the		
12	foregoing is true and correct.		
13	DATED II	20, 2017	
14	DATED: July	7 28, 2017 /s Jeff Nardinelli  Jeff Nardinelli	
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16	SIGNATURE ATTESTATION		
17	Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the		
18	filing of this document has been obtained from Jeff Nardinelli.		
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20	/s/ Charles K. Verhoeven Charles K. Verhoeven		
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